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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KATHERINE TOHANCZYN, individually and on behalf of all others similarly situated,) Case No.
) 2:17-cv-05031-JS
Plaintiff,)
) JOINT STIPULATION OF
) DISMISSAL OF ACTION WITH
) PREJUDICE AS TO THE NAMED
vs.) PLAINTIFF AND WITHOUT
) PREJUDICE AS TO THE
) PUTATIVE CLASS
IQ DATA INTERNATIONAL, INC., and)
DOES 1 through 10, inclusive, and each of)
them,)
)
Defendant.)

NOW COME THE PARTIES by and through their attorneys to respectfully move this Honorable Court to dismiss this matter with prejudice as to the named Plaintiff, and without prejudice as to the Putative Class alleged in the complaint, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Each party shall bear their own costs and attorney fees. A proposed order has been concurrently submitted to this Court.

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1 Respectfully submitted this 28th Day of March, 2018,

2 By: /S Cynthia Z. Levin
3 Cynthia Z. Levin, Esq. (PA 27050)
4 Law Offices of Todd M. Friedman, P.C.

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6 By: s/ Joel Wertman
7 Joel Wertman

8 Attorney for Defendant
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1 Filed electronically on this 28th Day of March, 2018, with:

2 United States District Court CM/ECF system

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4 Notification sent electronically via the Court's ECF system to:

5 Honorable Juan R. Sanchez
6 United States District Court
7 Eastern District of Pennsylvania

8 Edward Magulis
9 Attorney for Defendant

10 Submitted this 22 March 2018

11 By: s/ Cynthia Z. Levin
12 Cynthia Z. Levin.